

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	)	
	)	Chapter 11
FRANCHISE GROUP, INC., <sup>1</sup>	)	
	)	Case No. 24-12480 (LSS)
Reorganized Debtor.	)	
	)	Re: Docket No. 1890

**CERTIFICATION OF COUNSEL REGARDING *REVISED*  
PROPOSED ORDER SUSTAINING REORGANIZED DEBTORS’  
THIRD (3RD) OMNIBUS (SUBSTANTIVE) OBJECTION TO CLAIMS**

On October 17, 2025, the above-captioned reorganized debtor (the “Reorganized Debtor”, and together with its affiliated reorganized debtors before the effective date of the chapter 11 plan,<sup>2</sup> the “Debtors”) filed the *Reorganized Debtors’ Third (3<sup>rd</sup>) Omnibus (Substantive) Objection to Claims* [Docket No. 1890] (the “Objection”)<sup>3</sup> with the United States Bankruptcy Court for the District of Delaware (the “Court”). A proposed form of order sustaining the Objection was attached thereto as Exhibit 2 (the “Proposed Order”). Attached to the Proposed Order as Exhibits A, B, and C, respectively, were schedules of the (i) Reclassified Claims; (ii) Reduced Claim; and (iii) Reduced and Reclassified Claims subject to the Objection (collectively, the “Schedules”).

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<sup>1</sup> The last four digits of Franchise Group, Inc.’s federal tax identification number are 1876. The mailing address for Franchise Group, Inc. is 2371 Liberty Way, Virginia Beach, Virginia 23456. The term “Reorganized Debtors” includes Franchise Group, Inc. and certain reorganized debtor affiliates, a complete list of which, including the last four digits of their federal tax identification numbers and addresses, may be obtained on the website of the Reorganized Debtors’ claims and noticing agent, at <https://cases.ra.kroll.com/FRG/>. All of the motions, contested matters, and adversary proceedings that remained open as of the closing of any of the Reorganized Debtors’ cases, or that are opened after the date thereof, are administered in the remaining chapter 11 case of Franchise Group, Inc., Case No. 24-12480 (LSS).

<sup>2</sup> On June 6, 2025, all of the Debtors with the exception of Freedom VCM Holdings, LLC (“TopCo”) emerged from the chapter 11 cases as Reorganized Debtors [Docket No. 1605]. TopCo emerged from the chapter 11 cases as a Reorganized Debtor on July 3, 2025 [Docket No. 1689].

<sup>3</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Objection.

The deadline for parties to file and serve responses to the relief requested in the Objection was established as November 7, 2025, at 4:00 p.m. (prevailing Eastern Time) (the “Response Deadline”). No responses to the Objection were received prior to the Response Deadline.

The Reorganized Debtor has made certain revisions to the Proposed Order attached hereto as **Exhibit 1** (the “Revised Proposed Order”) to address the Court’s edits in connection with the entry of the *Order Sustaining Reorganized Debtors’ Second (2<sup>nd</sup>) Omnibus (Substantive) Objection to Claims* [Docket No. 1894].<sup>4</sup> For the convenience of the Court and other interested parties, a blackline comparing Revised Proposed Order to the Proposed Order is attached hereto as **Exhibit 2**.

WHEREFORE, as the Reorganized Debtor did not receive any objections or responses other than as described herein, the Reorganized Debtor respectfully requests that the Court enter the Revised Proposed Order without further notice or a hearing at the Court’s earliest convenience.

*[Remainder of Page Intentionally Left Blank]*

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<sup>4</sup> No changes have been made to the Schedules.

Dated: November 10, 2025  
Wilmington, Delaware

*/s/ Shella Borovinskaya*

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